

EXHIBIT A

From: [Michael Shore](#)
To: [Cohen, Justin S \(DAL - X61211\)](#); [jlahad](#)
Cc: [Team-Purdue-ST](#); [McKenney, Dina W \(DAL - X61757\)](#); [Max Ciccarelli](#); [Bustamante, Bryan J \(DAL - X61364\)](#); [Thom Tarnay](#); [STPurdueHKService](#)
Subject: RE: Purdue/ST - Rule 30b6 Depositions
Date: Thursday, December 15, 2022 11:21:52 AM

[External email]

Resolve it by stipulating the parts are US sales. Without that, we have to trace every sale and every subsequent use.

From: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>
Sent: Thursday, December 15, 2022 10:38 AM
To: John Lahad <jlahad@SusmanGodfrey.com>
Cc: Team-Purdue-ST <Team-Purdue-ST@shorefirm.com>; [McKenney, Dina W \(DAL - X61757\)](#) <Dina.McKenney@hklaw.com>; [Max Ciccarelli](#) <Max@CiccarelliLawFirm.com>; [Bustamante, Bryan J \(DAL - X61364\)](#) <Bryan.Bustamante@hklaw.com>; [Thom Tarnay](#) <ttarnay@tarnaylaw.com>; [STPurdueHKService](#) <STPurdueHKService@hklaw.com>
Subject: RE: Purdue/ST - Rule 30b6 Depositions

CAUTION: External Email!

John - please let me know if you can provide a response by Friday regarding the depo topics we discussed on Monday's meet-and-confer.

Also, after reviewing Purdue's response to the motion to quash by Tesla, SpaceX, and Sanmina, I want to re-open our discussion of resolving these subpoenas. Based on the response, it does not appear that Purdue wants or needs BOMs, emails, or technical info. Let me know if Purdue is open to resolving these subpoenas by having Tesla, SpaceX, and Sanmina provide their purchase history data, including shipping/importation info. If so, I'll take that back to them and hopefully we can resolve this dispute. If there is something specific in addition to their purchase history that Purdue believes it needs from these third parties, let me know and I will discuss it with them.

Finally, please let us know if we can schedule Ken Waite's 30(b)(6) deposition for the week of 16, such as on Jan. 18 or 19.

Thank you,

~Justin

Justin S. Cohen | Holland & Knight

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From: John Lahad <[jlahad@SusmanGodfrey.com](#)>
Sent: Friday, December 9, 2022 1:45 PM
To: Cohen, Justin S (DAL - X61211) <[Justin.Cohen@hklaw.com](#)>

Cc: Team-Purdue-ST <Team-Purdue-ST@shorefirm.com>; McKenney, Dina W (DAL - X61757) <Dina.McKenney@hklaw.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; Bustamante, Bryan J (DAL - X61364) <Bryan.Bustamante@hklaw.com>; Thom Tarnay <ttarnay@tarnaylaw.com>; STPurdueHKService <STPurdueHKService@hklaw.com>

Subject: RE: Purdue/ST - Rule 30b6 Depositions

[External email]

Justin:

This is disappointing. You demand deposition dates and file a dispute chart. We provide dates—well more than a month out—as requested on the timeline I said we would, and you decline the dates offered after sitting on them for more than a week. This strikes me as intentional delay designed to alter the schedule and perhaps trial date. In any event, how about you provide a set of dates that work for you and we can see if they work on our end. Note that many of us have a trial conflict in the last two weeks of January.

As to the time, you don't need 14 hours with Dr. Cooper. The 30b6 topics are duplicative of questions you'd ask in his individual capacity. We can discuss this on the meet and confer on the objections. I am free on Monday between noon and 2 pm or Tuesday after 2 pm.

As to the remaining topics:

Purdue designates Ken Waite, subject to its objections, to testify regarding Topics 12, 17, 18, 25, and 28.

Purdue designates Matt Halladay, subject to its objections, to testified regarding Topics 2, 3, 4, 5(g), 14, 15, 22, and 26.

In addition to the Topics designated below, we are designating Dr. Cooper for Topics 5(c), 5(j), and 29.

The depositions of Messrs. Waite and Halladay likely will be in Indianapolis.

Thanks.

John P. Lahad

Partner | Susman Godfrey LLP

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From: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>
Sent: Thursday, December 8, 2022 6:26 PM
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Cc: Team-Purdue-ST <Team-Purdue-ST@shorefirm.com>; McKenney, Dina W (DAL - X61757) <Dina.McKenney@hklaw.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; Bustamante, Bryan J (DAL - X61364) <Bryan.Bustamante@hklaw.com>; Thom Tarnay <ttarnay@tarnaylaw.com>; STPurdueHKService <STPurdueHKService@hklaw.com>
Subject: RE: Purdue/ST - Rule 30b6 Depositions

EXTERNAL Email

John - thank you for the objections and the proposed dates for Dr. Cooper's depositions. However, the week of Jan. 9 will not work for us. Please provide dates for Dr. Cooper's 30(b)(1) and 30(b)(6) deposition in late January or early February. Also, Defendants will be taking Dr. Cooper's individual Rule 30(b)(1) deposition first, and then Purdue's 30(b)(6) deposition for Dr. Cooper's topics. Regarding Dr. Cooper, we can discuss how to make these depositions efficient. But ST is not going to agree to an hours-based limitation for Dr. Cooper given his position, research history, and the number of topics that he is designated on. As you've seen from past depositions, we aim to be efficient.

Please let us know if you are open on Monday to meet-and-confer on the objections. Also, please provide additional dates for Purdue's 30(b)(6) witnesses.

Thank you,

~Justin

Justin S. Cohen | Holland & Knight

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From: John Lahad <jlahad@SusmanGodfrey.com>
Sent: Tuesday, November 29, 2022 9:34 PM
To: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>; McKenney, Dina W (DAL - X61757) <Dina.McKenney@hklaw.com>; Max Ciccarelli <Max@CiccarelliLawFirm.com>; Bustamante, Bryan J (DAL - X61364) <Bryan.Bustamante@hklaw.com>; Thom Tarnay <ttarnay@tarnaylaw.com>
Cc: Team-Purdue-ST <Team-Purdue-ST@shorefirm.com>
Subject: Purdue/ST - Rule 30b6 Depositions

[External email]

Counsel:

Attached please find Purdue's objections and responses to Defendants' 30(b)(6) notice. Note that we need to meet and confer on some of these. Please propose a

few dates and times. Subject to these objections, Purdue will present Dr. Cooper on the following topics:

Topic 1 (as to technical responses)

Topic 5(a), 5(b), 5(d) – 5(i)

Topic 7

Topic 9

Topic 20

We reserve the right to designate Dr. Cooper for additional topics or de-designate him based on meeting/confering about the topics or for any other reason.

We can present Dr. Cooper on January 11, 2023 for his Rule 30(b)(6) deposition. The deposition will take place in the Santa Fe, NM area. We will get you an exact location as soon as practicable.

I would imagine you want to depose Dr. Cooper in his capacity as an inventor. There will necessarily be overlap between that testimony and his testimony as a the 30(b)(6) designee. Accordingly, we will present Dr. Cooper for deposition in his individual capacity on January 13, 2023. We would like to make this as efficient as possible and given the significant overlap, a full second day of testimony should not be necessary. I propose 3.5 hours on the record for the second day. We can discuss on the meet and confer re the topics.

I am working on witnesses/dates for the remaining topics.

Thank you.

John P. Lahad

Partner | Susman Godfrey LLP

Houston | New York | Los Angeles | Seattle

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